

EXHIBIT C-2

NO. 2023PC02901

MACKENZIE HILL,

Plaintiff,

v.

**UNIFI AVIATION, LLC and
THE ESTATE OF DAVID RENNER,**

Defendants.

IN THE PROBATE COURT

NO. 1

BEXAR COUNTY, TEXAS

DEFENDANT UNIFI AVIATION, LLC'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

Unifi Aviation, LLC (“Unifi”) files its Original Answer to Plaintiff’s Petition (the “Petition”) and would respectfully show the Court as follows:

I. GENERAL DENIAL

1. Pursuant to Texas Rule of Civil Procedure 92, Unifi denies each and every allegation contained in the Petition and demands strict proof thereof as required by Texas law.

II. AFFIRMATIVE DEFENSES

2. Plaintiff fails to state a claim upon which relief may be granted.

3. Plaintiff’s claims are preempted in whole or in part by federal law, including the Airline Deregulation Act and other applicable federal statutes and regulations.

4. The alleged damages claimed by Plaintiff were solely and/or proximately caused by the acts, carelessness, omissions, and/or negligence of other persons or entities for whom Unifi neither had nor has any control or responsibility.

5. The alleged damages claimed by Plaintiff were solely and/or proximately caused by one or more new and independent, intervening, and/or superseding acts or omissions of other parties or persons for which Unifi is not liable or responsible.

6. Plaintiff lacks standing to assert claims under the Deceptive Trade Practices Act.

7. Plaintiff's claims for damages based on mental anguish are not recoverable to the extent they relate to Plaintiff's Deceptive Trade Practices Act causes of action because Unifi's alleged conduct, if any, was not intentional or knowing.

8. Plaintiff failed to provide any required notice of her Deceptive Trade Practices Act alleged claims and causes of action.

9. Any award of exemplary damages in this case would violate Unifi's right to due process guaranteed by the Due Process Clause of the 14th Amendment to the United States Constitution and Article 1, Section 19 of the Texas Constitution.

10. An award of exemplary damages in this case would violate the Equal Protection clauses of both the United States and Texas Constitutions in that an award of such damages is left to the unfettered discretion of the jury, and that under Texas law there are not adequate safeguards against an arbitrary and unreasonable imposition of such civil penalties.

11. Unifi asserts the burden of proof, unanimity, and all other provisions, conditions and limitations on exemplary damages imposed by Chapter 41 of the Texas Civil Practice & Remedies Code, including the limitations set out in § 41.008.

III. PRAYER

WHEREFORE, Unifi respectfully prays that upon final hearing hereof, Plaintiff take nothing, and that the Court allow Unifi to recover its costs, and all such other and further relief, both general and special, at law or in equity, to which Unifi may show itself to be justly entitled.

Respectfully submitted,

/s/ Stuart B. Brown, Jr.

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**ATTORNEYS FOR DEFENDANT UNIFI
AVIATION, LLC**

CERTIFICATE OF SERVICE

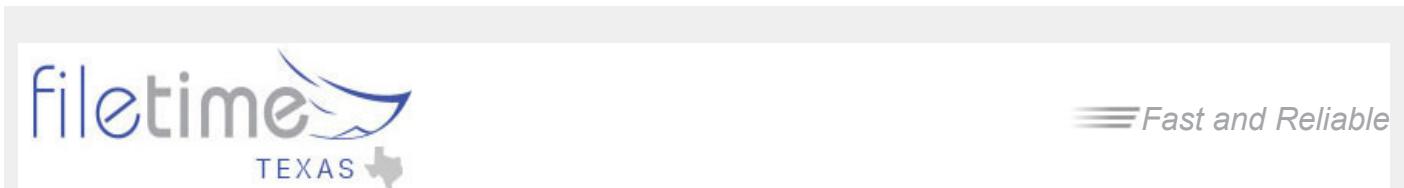
This is to certify that on August 8, 2023, a true and correct copy of the foregoing document was served via electronic service on all counsel of record.

/s/ Stuart B. Brown, Jr.

Stuart B. Brown, Jr.

From: support=filetime.com@mail.filetime.com on behalf of support@filetime.com
Sent: Tuesday, August 8, 2023 9:08 AM
To: Russo, Steve
Subject: Submitted new filing(s) for case#2023PC02901 with submission id#78294796

****RECEIVED FROM EXTERNAL SENDER – USE CAUTION****



Proof of Submission

Submission ID: 78294796 **Cause No:** 2023PC02901
Submission Date & Time: 08/08/23 09:08 AM CDST **Client ID:** 165286.00001
Plaintiff: MacKenzie Hill **Document:** 2023-08-08 Def. Unifi Original Answer.pdf
Defendant: Unifi Aviation, LLC
Decedent: David Renner
Defendant: THE ESTATE OF DAVID RENNER

Case Information

Case Title: MACKENZIE HILL V. UNIFI AVIATION, LLC AND THE ESTATE OF DAVID RENNER
Jurisdiction: Bexar County - Probate Court #1
Case Category: Probate - Other
Case Type: PLAINTIFF'S ORIG PETITION
Payment Account: FileTime

Fees Breakdown

Court Fees

Answer/Response

Filing Fee	\$0.00
Total Fee For This Filing	\$0.00

Submission Fees

eFiling Manager Convenience Fee	\$1.00
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FileTime Service Fee	\$3.99
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Sales Tax on FileTime Fee	\$0.33
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Total Submission Fees	\$5.32
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Total Fees for this Filing	\$5.32
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Credit Card Information for This Filing

Your credit card statement will show:

Pleading

Jurisdiction	\$0.00
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Case Parties

Party Type	Name	Our Client
Plaintiff	MacKenzie Hill	No
Defendant	Unifi Aviation, LLC	Yes
Decedent	David Renner	No
Defendant	THE ESTATE OF DAVID RENNER	No

Filings

Filing Type: eFile & eServe

Filing	Documents

Answer/Response	Document 2023-08-08 Def. Unifi Original Answer.pdf	Type Lead Document	Security Does not contain sensitive data	eFiling Manager	\$5.32
Filing Description: Defendant Unifi Aviation, LLC's Original Answer					
Service Contacts					
Name					
Stuart Brown Kshitiz Gautam Josué Galván Cheryl Leger Celia Morales Dalia Vicencio Stephen Russo					
Service Recipients					
Name	Firm Name				
Lewis Wood	The James Wood Law Firm, PLLC				
James Wood	The James Wood Law Firm, PLLC				
Natalie Jordan	The James Wood Law Firm, PLLC				
Nicole Regan	The James Wood Law Firm				